

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

Printpack Inc.
1505 West Main Street
Greensburg, Indiana 47240

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T031-5950-00001	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 22, 1998

First Administrative Amendment 031-10694, issued March 9, 1999.
First Minor Permit Modification 031-10656, issued September 10, 1999.

First Significant Permit Modification 031-12005	Pages Amended: 7, 30-38, 40a-d
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

- (8) One (1) four-color flexographic printing press, identified as P12, using a natural gas fired catalytic incinerator, OX12, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP12. The maximum printing width is 48 inches and the maximum output is 1252 feet per minute.
- (9) One (1) four-color flexographic printing press, identified as P13, using a natural gas fired catalytic incinerator, OX13, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP13. The maximum printing width is 48 inches and the maximum output is 1536 feet per minute.
- (10) One (1) six-color flexographic printing press, identified as P14, using a natural gas fired catalytic incinerator, OX14, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP14. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.
- (11) One (1) eight-color flexographic printing press, identified as P15, using permanent total enclosure and a natural gas fired catalytic incinerator, OX15, with a rated capacity of 2.835 MM Btu/hr as control, and exhausting to stack SP15. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.
- (12) One (1) flexographic printing press, identified as P16, including a drying system rated at 1.0 million British thermal units per hour (MM Btu/hr), using a natural gas fired catalytic incinerator, OX16, with a rated capacity of 8.0 MM Btu/hr as control, and exhausting to stack SP16. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.
- (13) One (1) manual parts washer system, PW1, exhausting to stack SW1.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements. The insignificant sources at this facility which do not have applicable rules are included in the technical support document for this permit.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).

SECTION D.2 FACILITY OPERATION CONDITIONS

[Facility Description [326 IAC 2-7-5(15)]

- (8) One (1) four-color flexographic printing press, identified as P12, using a natural gas fired catalytic incinerator, OX12, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP12. The maximum printing width is 48 inches and the maximum output is 1252 feet per minute.
- (9) One (1) four-color flexographic printing press, identified as P13, using a natural gas fired catalytic incinerator, OX13, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP13. The maximum printing width is 48 inches and the maximum output is 1536 feet per minute.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the printing presses P12 and P13 shall utilize a VOC capture system sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of 60% or greater.

D.2.2 Volatile Organic Compound (VOC) [326 IAC 2-2-1 et seq.]

The annual VOC input to Presses P12 and P13 shall be limited such that the potential to emit does not exceed 176 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency})) < / = 176 \text{ tons}$. Therefore, the requirements of 326 IAC 2-2-1 et seq. (Prevention of Significant Deterioration Requirements) do not apply.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.5 Control Requirement

Pursuant to OP-16-04-87-0048, issued on February 5, 1986, the catalytic oxidizers (OX12 or OX13) for VOC control shall be in operation at all times when the respective presses (P12 or P13) are in operation.

D.2.6 Testing Requirements [326 IAC 2-7-6(1)]

- (a) On or before July 31, 2001, the Permittee shall perform one capture test on either Press P12 or Press P13, as selected by IDEM, OAM.
- (b) Compliance stack tests shall be performed for both of the catalytic oxidizers, OX 12 and OX 13, used to achieve compliance with 326 IAC 8-5-5. The initial stack tests shall be performed on both oxidizers on or before July 31, 2001 and thereafter, both catalytic oxidizers shall be tested every two and one half (2 1/2) years (plus/minus 60 days) to determine the minimum operating temperature that will achieve a 90% or greater destruction efficiency for these catalytic oxidizers, OX 12 and OX 13. For purposes of the initial stack tests, the same printing material shall be used on P12 and P13.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.7 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.
- (b) The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation when the printing presses are operated.
- (c) To assure that exhaust fumes are captured at a rate equivalent to or greater than the rate documented during the capture test described in Condition D.2.6 (a), the oxidizer system fans shall operate at or above the frequency range established during the capture test when the presses are running. Prior to the performance of the capture test described in Condition D.2.6(a), the oxidizer system fans shall operate within the 55-60 Hz frequency range when the presses are running. Meters and recorders shall be installed and operated on or before June 1, 2000 to document compliance with this condition.
- (d) Additional inspection and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:
 - (1) Monthly inspection and repair, as necessary, of flexible press hoses and fan motor belts;
 - (2) Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);
 - (3) Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;
 - (4) Monthly visual inspections of rooftop ductwork;
 - (5) Annual flow direction (i.e., "smoke") tests; and
 - (6) Implementation of an operational procedure checklist, including response procedures for deviations from the established fan run-mode Hz range.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (a) through (g) below. Records maintained for (a) through (g) shall be complete and sufficient to establish compliance with Conditions D.2.1 and D.2.2.

- (a) Pounds of VOC usage from inks, coatings and press cleaning each day (this information may be retained in the computerized information management system of the plant);
- (b) Pounds of VOC usage from inks, coatings and press cleaning each month (this information may be retained in the plant's computerized information management system);
- (c) The calculated weight of VOCs emitted for each month as determined by the equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency}))$;
- (d) The calculated 12 month rolling sum of emissions for each month;
- (e) A copy of the most recent oxidizer destruction efficiency test report;
- (f) A copy of the representative baseline capture efficiency test report; and
- (g) Parametric monitoring records required under section D.2.7.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3

FACILITY OPERATION CONDITIONS

[Facility Description [326 IAC 2-7-5(15)]]

- (10) One (1) six-color flexographic printing press, identified as P14, using a natural gas fired catalytic incinerator, OX14, with a rated capacity of 1.2 MM Btu/hr as control, and exhausting to stack SP14. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the printing press P14 shall utilize a VOC capture system sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of 60% or greater.

D.3.2 Volatile Organic Compound (VOC) [326 IAC 2-2-1 et seq.]

The annual VOC input to Press P14 shall be limited such that the potential to emit does not exceed 60 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency})) < / = 60 \text{ tons}$. Therefore, the requirements of 326 IAC 2-2-1 et seq. (Prevention of Significant Deterioration Requirements) do not apply.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.5 Control Requirement

Pursuant to OP-16-04-87-0049, issued on February 5, 1986, the catalytic oxidizer (OX14) for VOC control shall be in operation at all times when the press (P14) is in operation.

D.3.6 Testing Requirements [326 IAC 2-7-6(1)]

- (a) On or before July 31, 2001, the Permittee shall perform one capture test on Press P14.
- (b) Compliance stack tests shall be performed on the catalytic oxidizer, OX 14, used to achieve compliance with 326 IAC 8-5-5. The initial test shall be performed on or before July 31, 2001 and thereafter at least once every two and one half (2 1/2) years (plus/minus 60 days) to determine the minimum operating temperature that will achieve a 90% or greater destruction efficiency for the oxidizer, OX 14.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for

any one reading.

- (b) The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizer shall be in operation when the printing press is operated.
- (c) To assure that exhaust fumes are captured at a rate equivalent to or greater than the rate documented during the capture test described in Condition D.3.6 (a), the oxidizer system fan shall operate at or above the frequency range established during the capture test when Press P14 is running. Prior to the performance of the capture test described in Condition D.3.6(a), the oxidizer system fan shall operate within the 55-60 Hz frequency range when Press P14 is running. A meter and recorder shall be installed and operated on or before June 1, 2000 to document compliance with this condition.
- (d) Additional inspections and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:
 - (1) Monthly inspection and repair, as necessary, of flexible press hoses and fan motor belts;
 - (2) Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);
 - (3) Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shell for cracked welds and loose flange bolts;
 - (4) Monthly visual inspections of rooftop ductwork;
 - (5) Annual flow direction (i.e., "smoke") tests; and
 - (6) Implementation of an operational procedure checklist, including response procedures for deviations from the established fan run-mode Hz range.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements

To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (a) through (g) below. Records maintained for (a) through (g) shall be complete and sufficient to establish compliance with Conditions D.3.1 and D.3.2.

- (a) Pounds of VOC usage from inks, coatings and press cleaning each day (this information may be retained in the computerized information management system of the plant);
- (b) Pounds of VOC usage from inks, coatings and press cleaning each month (this information may be retained in the plant's computerized information management system);
- (c) The calculated weight of VOCs emitted for each month as determined by the equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency}))$;
- (d) The calculated 12 month rolling sum of emissions for each month;
- (e) A copy of the most recent oxidizer destruction efficiency test report;
- (f) A copy of the representative baseline capture efficiency test report; and
- (g) Parametric monitoring records required under section D.3.7.

D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 and D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4

FACILITY OPERATION CONDITIONS

[Facility Description [326 IAC 2-7-5(15)]]

- (11) One (1) eight-color flexographic printing press, identified as P15, using permanent total enclosure and a natural gas fired catalytic incinerator, OX15, with a rated capacity of 2.835 MM Btu/hr as control, and exhausting to stack SP15. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the printing press P15 shall utilize a VOC capture system sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of 60% or greater.

D.4.2 Volatile Organic Compound (VOC) [326 IAC 2-2-1 et seq.]

The annual VOC input to Press P15 shall be limited such that the potential to emit does not exceed 39 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency})) < / = 39 \text{ tons}$. Therefore, the requirements of 326 IAC 2-2-1 et seq. (Prevention of Significant Deterioration Requirements) do not apply.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.4.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 and D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.5 Control Requirement

Pursuant to CP 031-2102 ID 031-00001, issued on July 31, 1991, the catalytic oxidizer (OX15) for VOC control shall be in operation at all times when the press (P15) is in operation.

D.4.6 Testing Requirements [326 IAC 2-7-6(1)]

- (a) On or before July 31, 2001, the Permittee shall perform one capture test on Press P15 using EPA Method 204.
- (b) Compliance stack tests shall be performed on the catalytic oxidizer, OX 15, used to achieve compliance with 326 IAC 8-5-5. The initial test shall be performed on or before July 31, 2001 and thereafter at least once every two and one half (2 1/2) years (plus/minus 60 days) to determine the minimum operating temperature that will achieve a 90% or greater destruction efficiency for the oxidizer, OX 15. The Permanent Total Enclosure ("PTE") associated with press P15 shall be verified as meeting EPA Method 204 design criteria as part of the periodic test program for OX 15.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.7 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the

catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.

- (b) The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation when the printing presses are operated.
- (c) To assure the continuing integrity of the PTE surrounding press P15, inspections and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:
 - (1) Monthly inspection and repair, as necessary, of flexible press hoses and fan motor belts;
 - (2) Monthly verification of air flow velocity at 200 feet per minute or greater inward through any natural draft opening in the PTE;
 - (3) Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizer, press supply ducts, and press exhaust ducts);
 - (4) Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;
 - (5) Monthly visual inspections of rooftop ductwork; and
 - (6) Implementation of an operational procedure checklist, including response procedures for deviations from the established operating conditions.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements

To document compliance with Conditions D.4.1 and D.4.2, the Permittee shall maintain records in accordance with (a) through (g) below. Records maintained for (a) through (g) shall be complete and sufficient to establish compliance with Conditions D.4.1 and D.4.2.

- (a) Pounds of VOC usage from inks, coatings and press cleaning each day (this information may be retained in the computerized information management system of the plant);
- (b) Pounds of VOC usage from inks, coatings and press cleaning each month (this information may be retained in the plant's computerized information management system);
- (c) The calculated weight of VOCs emitted for each month as determined by the equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency}))$;
- (d) The calculated 12 month rolling sum of emissions for each month;
- (e) A copy of the most recent oxidizer destruction efficiency test report;
- (f) A copy of the most recent PTE verification report; and
- (g) Parametric monitoring records required under section D.4.7.

D.4.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 and D.4.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.5

FACILITY OPERATION CONDITIONS

[Facility Description [326 IAC 2-7-5(15)]]

- (12) One (1) flexographic printing press, identified as P16, including a drying system rated at 1.0 million British thermal units per hour (MM Btu/hr), using a natural gas fired catalytic incinerator, OX16, with a rated capacity of 8.0 MM Btu/hr as control, and exhausting to stack SP16. The maximum printing width is 52 inches and the maximum output is 1000 feet per minute.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the printing press P16 shall utilize a VOC capture system sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of 60% or greater.

D.5.2 Volatile Organic Compound (VOC) [326 IAC 2-2-1 et seq.]

The annual VOC input to Press P16 shall be limited such that the potential to emit does not exceed 39 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency})) < / = 39 \text{ tons}$. Therefore, the requirements of 326 IAC 2-2-1 et seq. (Prevention of Significant Deterioration Requirements) do not apply.

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.5.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.5.1 and D.5.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.5.5 Control Requirement

Pursuant to CP 031-3576, ID 031-00001, issued on September 12, 1994, the catalytic oxidizer (OX16) for VOC control shall be in operation at all times when the press (P16) is in operation.

D.5.6 Testing Requirements [326 IAC 2-7-6(1)]

- (a) On or before July 31, 2001, the Permittee shall perform one capture test on Press P16.
- (a) Compliance stack tests shall be performed on the catalytic oxidizer, OX 16, used to achieve compliance with 326 IAC 8-5-5. The initial test shall be performed on or before July 31, 2001 and thereafter at least once every two and one half (2 1/2) years (plus/minus 60 days) to determine the minimum operating temperature that will achieve a 90% or greater destruction efficiency for the oxidizer, OX 16.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.7 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature

used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.

- (b) The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation when the printing press is operated.
- (c) To assure that exhaust fumes are captured at a rate equivalent to or greater than the rate documented during the capture test described in Condition D.5.5 (a), the oxidizer system fan shall operate at or above the frequency range established during the capture test when Press P16 is running. Prior to the performance of the capture test described in Condition D.5.5(a), the oxidizer system fan shall operate within the 27-32 Hz frequency range when Press P16 is running. A meter and recorder shall be installed and operated on or before June 1, 2000 to document compliance with this condition.
- (d) Additional inspection and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:
 - (1) Monthly inspection and repair, as necessary, of flexible press hoses and fan motor belts;
 - (2) Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);
 - (3) Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;
 - (4) Monthly visual inspections of rooftop ductwork;
 - (5) Annual flow direction (i.e., "smoke") tests; and
 - (6) Implementation of an operational procedure checklist, including response procedures for deviations from the established fan run-mode Hz range.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.8 Record Keeping Requirements

To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (a) through (g) below. Records maintained for (a) through (g) shall be complete and sufficient to establish compliance with Conditions D.5.1 and D.5.2.

- (a) Pounds of VOC usage from inks, coatings and press cleaning each day (this information may be retained in the computerized information management system of the plant);
- (b) Pounds of VOC usage from inks, coatings and press cleaning each month (this information may be retained in the plant's computerized information management system);
- (c) The calculated weight of VOCs emitted for each month as determined by the equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency}))$;
- (d) The calculated 12 month rolling sum of emissions for each month;
- (e) A copy of the most recent oxidizer destruction efficiency test report;
- (f) A copy of the representative baseline capture efficiency test report; and
- (g) Parametric monitoring records required under section D.5.7.

D.5.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 and D.5.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.6

FACILITY OPERATION CONDITIONS

[Facility Description [326 IAC 2-7-5(15)]]

(13) One (1) manual parts washer system, identified as PW1, using no control, and exhausting to stack SW1.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compound (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the cold cleaning facility shall:

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;
- (c) close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operation requirements;
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.4 Monitoring

There is no monitoring required of this degreaser.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.5 Record Keeping Requirements

To document compliance with Conditions D.6.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions

- (1) The degreaser solvent usage for each month;
- (2) Records of any disposal of degreaser solvent as waste;

SECTION D.8 FACILITY OPERATION CONDITIONS

[Facility Description [326 IAC 2-7-5(15)]

- (14) One (1) flexographic printing press, identified as P17, including a drying system rated at 0.8 million British thermal units per hour (MM Btu/hr), using the catalytic incinerator, OX16, as control, and exhausting to stack SP16. The maximum printing width is 62 inches and the maximum output is 1200 feet per minute.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the printing press P17 shall utilize a VOC capture system sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of 60% or greater.

D.8.2 Volatile Organic Compound (VOC) [326 IAC 2-2-1 et seq.]

- a. The annual VOC input to Press P17 shall be limited such that the potential to emit does not exceed 35.44 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency})) \leq 35.44$ tons. Therefore, the requirements of 326 IAC 2-2-1 et seq. (Prevention of Significant Deterioration Requirements) do not apply.
- b. Press Nos. 8, 10, and 11 shall be permanently shut down.

D.8.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.8.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.8.1 and D.8.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.8.5 Testing Requirements [326 IAC 2-7-6(1)]

- (a) On or before July 31, 2001, the Permittee shall perform one capture test on Press P17 using EPA Method 204.
- (b) Compliance stack tests shall be performed on the catalytic oxidizer, OX 16, used to achieve compliance with 326 IAC 8-5-5. The initial test shall be performed on or before July 31, 2001 and thereafter at least once every two and one half (2 1/2) years (plus/minus 60 days) to determine the minimum operating temperature that will achieve a 90% or greater destruction efficiency for the oxidizer, OX 16. The Permanent Total Enclosure ("PTE") associated with press P17 shall be verified as meeting EPA Method 204 design criteria as part of the periodic test program for OX 17.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.8.6 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic incinerator for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the

temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.

- (b) The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation when the printing presses are operated.
- (c) To assure the continuing integrity of the PTE surrounding press 17, inspections and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:
 - (i) Monthly inspection and repair, as necessary, of flexible press hoses and fan motor belts;
 - (ii) Monthly verification of air flow velocity at 200 feet per minute or greater inward through any natural draft opening in the PTE;
 - (iii) Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizer, press supply ducts, and press exhaust ducts);
 - (iv) Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;
 - (v) Monthly visual inspections of rooftop ductwork; and
 - (vi) Implementation of an operational procedure checklist, including response procedures for deviations from the established operating conditions.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.8.7 Record Keeping Requirements

To document compliance with Conditions D.8.1 and D.8.2, the Permittee shall maintain records in accordance with (a) through (g) below. Records maintained for (a) through (g) shall be complete and sufficient to establish compliance with Conditions D.8.1 and D.8.2.

- (a) Pounds of VOC usage from inks, coatings and press cleaning each day (this information may be retained in the computerized information management system of the plant);
- (b) Pounds of VOC usage from inks, coatings and press cleaning each month (this information may be retained in the plant's computerized information management system);
- (c) The calculated weight of VOCs emitted for each month as determined by the equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency}))$;
- (d) The calculated 12 month rolling sum of emissions for each month;
- (e) A copy of the most recent oxidizer destruction efficiency test report;
- (f) A copy of the representative baseline capture efficiency test report; and
- (g) Parametric monitoring records required under section D.8.6.

D.8.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.8.1 and D.8.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.9

FACILITY OPERATION CONDITIONS

[Facility Description [326 IAC 2-7-5(15)]

- (15) Two (2) flexographic printing presses, identified as P18 and P19, including drying systems rated at 0.8 million British thermal units per hour (MM Btu/hr) each, using a natural gas fired regenerative thermal oxidizer, OX20, with a rated capacity of 8.8 MM Btu/hr as control, and exhausting to stack SP20. The maximum printing width for each press is 62 inches and the maximum output is 1200 feet per minute.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.9.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the printing presses P18 and P19 shall utilize a VOC capture system sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of 60% or greater.

D.9.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2 et seq.]

- (a) The annual VOC input to Presses P18 and P19 shall be limited such that the potential to emit does not exceed 42.54 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency})) < / = 42.54 \text{ tons}$. Therefore, the requirements of 326 IAC 2-2-1 et seq. (Prevention of Significant Deterioration Requirements) do not apply.

- (b) Press Nos 8, 10, and 11 shall be permanently shut down.

D.9.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and the control device.

Compliance Determination Requirements

D.9.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.9.1 and D.9.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.9.5 Testing Requirements [326 IAC 2-7-6(1)]

- (a) Within 120 days after startup, the Permittee shall perform capture testing on Presses P18 and P19 using EPA Method 204.
- (b) Compliance stack tests shall be performed on the catalytic oxidizer, OX 20, used to achieve compliance with 326 IAC 8-5-5. The initial test shall be performed within 120 days after startup and thereafter at least once every two and one half (2 1/2) years (plus/minus 60 days) to determine the minimum operating temperature that will achieve a 90% or greater destruction efficiency for the oxidizer, OX 20. The Permanent Total Enclosure ("PTE") associated with presses P18 and P19 shall be verified as meeting EPA Method 204 design criteria as part of the periodic test program for OX 20.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.9.6 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.
- (b) The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation when the printing presses are operated.
- (c) To assure continuing integrity of the PTE surrounding presses P18 and P19, inspections and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:
 - (a) Monthly inspection and repair, as necessary, of flexible press hoses and fan motor belts;
 - (b) Monthly verification of air flow velocity at 200 feet per minute or greater inward through any natural draft opening in the PTE;
 - (c) Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizer, press supply ducts, and press exhaust ducts);
 - (d) Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;
 - (e) Monthly visual inspections of rooftop ductwork; and
 - (f) Implementation of an operational procedure checklist, including response procedures for deviations from the established operating conditions.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.9.7 Record Keeping Requirements

To document compliance with Conditions D.9.1 and D.9.2, the Permittee shall maintain records in accordance with (a) through (g) below. Records maintained for (a) through (g) shall be complete and sufficient to establish compliance with Conditions D.9.1 and D.9.2.

- (a) Pounds of VOC usage from inks, coatings and press cleaning each day (this information may be retained in the computerized information management system of the plant);
- (b) Pounds of VOC usage from inks, coatings and press cleaning each month (this information may be retained in the plant's computerized information management system);
- (c) The calculated weight of VOCs emitted for each month as determined by the equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency}))$;
- (d) The calculated 12 month rolling sum of emissions for each month;
- (e) A copy of the most recent oxidizer destruction efficiency test report;
- (f) A copy of the representative baseline capture efficiency test report; and
- (g) Parametric monitoring records required under section D.9.6.

D.9.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.9.1 and D.9.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Printpack, Inc.
Source Location:	1505 West Main Street, Greensburg, Indiana 47240
County:	Decatur
SIC Code:	3714
Operation Permit No.:	T 031-5950-00001
Operation Permit Issuance Date:	December 21, 1998
Significant Permit Modification No.:	031-12005-00001
Permit Reviewer:	Gurinder Saini

The Office of Air Management (OAM) has reviewed a modification application from Printpack, Inc. relating to the operation of a printed plastic bag and plastic film production plant.

History

On March 9, 2000, an agreement was reached for modification of certain permit conditions in the Title V permit for this plant. These conditions were either from the original permit 031-5950 or from the First Minor Permit Modification 031-10656. Further, on September 18, 2000, Company requested other changes to the permit languages. Conditions in Section D will be adjusted as a part of this agreement.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Rule Applicability

There are no changes in the state or federal rule applicabilities related to these changes.

Permit Changes

The permit will be modified as follows (using the bold and strikeout method):

1) Condition D.2.1

D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

~~Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), the printing presses P12 and P13 shall utilize an alternative VOC reduction system that achieves at least 90% overall efficiency.~~

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the printing presses P12 and P13 shall utilize a VOC capture system sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of 60% or greater.

2) Condition D.2.2

D.2.2 Volatile Organic Compound (VOC) Emission Limit

The quantity of ink and solvent content, as percent VOC by weight, shall be such that the monthly rolling VOC input shall not exceed 1760 tons per year. Therefore, the requirements of 326 IAC 2-2 and (Prevention of Significant Deterioration) do not apply.

D.2.2 Volatile Organic Compound (VOC) [326 IAC 2-2-1 et seq.]

The annual VOC input to Presses P12 and P13 shall be limited such that the potential to emit does not exceed 176 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency})) \leq 176 \text{ tons}$. Therefore, the requirements of 326 IAC 2-2-1 et seq. (Prevention of Significant Deterioration Requirements) do not apply.

3) Condition D.2.6

D.2.6 Testing Requirements [326 IAC 2-7-6(1)]

Compliance stack tests shall be performed for both of the catalytic incinerators, OX12 or OX13, used to achieve compliance with 326 IAC 8-5-5. The initial stack tests shall be performed on both incinerators within 180 days of the issuance of this permit, and thereafter, both catalytic incinerators shall be tested every two and one half (2 1/2) years to determine the minimum operating temperature that will achieve at least a 90% overall efficiency for this incinerator and the emission limit specified in Condition D.2.2.

- (a) On or before July 31, 2001, the Permittee shall perform one capture test on either Press P12 or Press P13, as selected by IDEM, OAM.
- (b) Compliance stack tests shall be performed for both of the catalytic oxidizers, OX 12 and OX 13, used to achieve compliance with 326 IAC 8-5-5. The initial stack tests shall be performed on both oxidizers on or before July 31, 2001 and thereafter, both catalytic oxidizers shall be tested every two and one half (2 1/2) years (plus/minus 60 days) to determine the minimum operating temperature that will achieve a 90% or greater destruction efficiency for these catalytic oxidizers, OX 12 and OX 13. For purposes of the initial stack tests, the same printing material shall be used on P12 and P13.

4) Condition D.2.7

D.2.7 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.
- (b) The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation when the printing presses are operated.
- (c) To assure that exhaust fumes are captured at a rate equivalent to or greater than the rate documented during the capture test described in Condition D.2.6 (a), the oxidizer system fans shall operate at or above the frequency range established during the capture test when the presses are running. Prior to the performance of

the capture test described in Condition D.2.6(a), the oxidizer system fans shall operate within the 55-60 Hz frequency range when the presses are running. Meters and recorders shall be installed and operated on or before June 1, 2000 to document compliance with this condition.

- (d) Additional inspection and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:**
- (1) Monthly inspection and repair, as necessary, of flexible press hoses and fan motor belts;**
 - (2) Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);**
 - (3) Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;**
 - (4) Monthly visual inspections of rooftop ductwork;**
 - (5) Annual flow direction (i.e., "smoke") tests; and**
 - (6) Implementation of an operational procedure checklist, including response procedures for deviations from the established fan run-mode Hz range.**

5) Condition D.2.8

D.2.8 Record Keeping Requirements

~~To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.2:~~

- ~~(1) The VOC content of the inks used for each month;~~
- ~~(2) The cleanup solvent usage for each month;~~
- ~~(3) The total VOC usage for each month; and~~
- ~~(4) The weight of VOCs emitted for each compliance period.~~
- ~~(5) The continuous temperature records for the catalytic incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.~~
- ~~(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (a) through (g) below. Records maintained for (a) through (g) shall be complete and sufficient to establish compliance with Conditions D.2.1 and D.2.2.

- (a) Pounds of VOC usage from inks, coatings and press cleaning each day (this information may be retained in the computerized information management system of the plant);**
- (b) Pounds of VOC usage from inks, coatings and press cleaning each month (this information may be retained in the plant's computerized information management system);**
- (c) The calculated weight of VOCs emitted for each month as determined by the equation: (VOC usage) * (1 - (capture efficiency * destruction efficiency));**

- (d) The calculated 12 month rolling sum of emissions for each month;
- (e) A copy of the most recent oxidizer destruction efficiency test report;
- (f) A copy of the representative baseline capture efficiency test report; and
- (g) Parametric monitoring records required under section D.2.7.

6) Condition D.3.1

The modifications are made to section D.3 of the permit. The modified pages 32 and 33 of this modification supercedes page 34a of the First Minor Permit Modification and page 32 and 33 of the original TV permit 031-5950-00001.

D.3.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

~~Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), the printing press P14 shall utilize an alternative VOC reduction system that achieves at least 90% overall efficiency.~~

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the printing press P14 shall utilize a VOC capture system sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of 60% or greater.

7) Condition D.3.2

~~D.3.2 Volatile Organic Compound (VOC) Emission Limit~~

~~The quantity of ink and solvent content, as percent VOC by weight, shall be such that the monthly rolling VOC input shall not exceed 600 tons per year. Therefore, the requirements of 326 IAC 2-2 and (Prevention of Significant Deterioration) do not apply.~~

D.3.2 Volatile Organic Compound (VOC) [326 IAC 2-2-1 et seq.]

The annual VOC input to Press P14 shall be limited such that the potential to emit does not exceed 60 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) * (1 - (capture efficiency * destruction efficiency)) < / = 60 tons. Therefore, the requirements of 326 IAC 2-2-1 et seq. (Prevention of Significant Deterioration Requirements) do not apply.

8) Condition D.3.6 -

This condition was modified by First Minor Permit Modification No.031-10656. A new page 34a was added to the permit which contained the modified condition.

D.3.6 Testing Requirements [326 IAC 2-7-6(1)]

- ~~(a) The Compliance stack tests shall be performed for the **capture and** catalytic incinerator, OX14, used to achieve compliance with 326 IAC 8-5-5. This stack test shall be performed by the end of the year 1998 ~~1999~~, and thereafter at least once every two and one half (2 ½) years, to determine the minimum operating temperature that will achieve at least a 90% overall efficiency for this incinerator and the emission limit specified in Condition D.3.2.~~
- (a) **On or before July 31, 2001, the Permittee shall perform one capture test on Press P14.**
- (b) **Compliance stack tests shall be performed on the catalytic oxidizer, OX 14, used**

to achieve compliance with 326 IAC 8-5-5. The initial test shall be performed on or before July 31, 2001 and thereafter at least once every two and one half (2 1/2) years (plus/minus 60 days) to determine the minimum operating temperature that will achieve a 90% or greater destruction efficiency for the oxidizer, OX 14.

9) Condition D.3.7

D.3.7 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.
- (b) **The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizer shall be in operation when the printing press is operated.**
- (c) **To assure that exhaust fumes are captured at a rate equivalent to or greater than the rate documented during the capture test described in Condition D.3.6 (a), the oxidizer system fan shall operate at or above the frequency range established during the capture test when Press P14 is running. Prior to the performance of the capture test described in Condition D.3.6(a), the oxidizer system fan shall operate within the 55-60 Hz frequency range when Press P14 is running. A meter and recorder shall be installed and operated on or before June 1, 2000 to document compliance with this condition.**
- (d) **Additional inspections and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:**
 - (1) **Monthly inspection and repair, as necessary, of flexible press hoses and fan motor belts;**
 - (2) **Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);**
 - (3) **Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shell for cracked welds and loose flange bolts;**
 - (4) **Monthly visual inspections of rooftop ductwork;**
 - (5) **Annual flow direction (i.e., "smoke") tests; and**
 - (6) **Implementation of an operational procedure checklist, including response procedures for deviations from the established fan run-mode Hz range.**

10) Condition D.3.8

D.3.8 Record Keeping Requirements

~~To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.3.2.~~

-
- ~~(1) The volume weighted VOC content of the coatings used for each month;~~
 - ~~(2) The cleanup solvent usage for each month;~~
 - ~~(3) The total VOC usage for each month; and~~

- ~~_____ (4) The weight of VOCs emitted for each compliance period.~~
- ~~_____ (5) The continuous temperature records for the catalytic incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.~~
- ~~_____ (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (a) through (g) below. Records maintained for (a) through (g) shall be complete and sufficient to establish compliance with Conditions D.3.1 and D.3.2.

- (a) Pounds of VOC usage from inks, coatings and press cleaning each day (this information may be retained in the computerized information management system of the plant);**
- (b) Pounds of VOC usage from inks, coatings and press cleaning each month (this information may be retained in the plant's computerized information management system);**
- (c) The calculated weight of VOCs emitted for each month as determined by the equation: (VOC usage) * (1 - (capture efficiency * destruction efficiency));**
- (d) The calculated 12 month rolling sum of emissions for each month;**
- (e) A copy of the most recent oxidizer destruction efficiency test report;**
- (f) A copy of the representative baseline capture efficiency test report; and**
- (g) Parametric monitoring records required under section D.3.7.**

11) Condition D.4.1

The modifications are made to section D.4 of the permit. The modified pages 34 and 35 containing section D.4 of this modification completely supercedes section D.4 on page 36a of the First Minor Permit Modification and page 34 and 35 of the original TV permit 031-5950-00001.

This condition was modified by First Minor Permit Modification No.031-10656. A new page 34a was added to the permit which contained the modified condition.

~~D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5][326 IAC 2-2, and 40 CFR 52.21]~~

- ~~_____ (a) When operating the incinerator to achieve the limit for rule 326 IAC 8-5-5(e)(3), a capture system must be used in conjunction with the incinerator to attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the incinerator, of 60% for the printing press no. 15. The overall destruction efficiency and the use of incinerator are required by the rule 326 IAC 8-5-5.~~
- ~~_____ (b) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Miscellaneous operations: graphic arts operations), on and after the date the performance test is completed, the owner or operator shall not cause or discharge more than 10 percent of the captured VOC's for each calendar month (90 % VOC destruction efficiency of the incinerator) from the flexographic printing press no. 15 by using the incinerator operated at the most recently demonstrated overall efficiency.~~

- ~~(c) Pursuant to OP No. 16-04-87-0049, the input of VOC to the printing press 15 shall be limited to less than 100 tons of VOC, including inks, solvents, and cleaning solvents as shown by the following equation, per 12 consecutive month period.~~
- ~~(VOC input to the printing press no. 15 including inks and dilution solvents + cleaning solvents) * (1 - capture efficiency)(1 - control efficiency) < 40 tons per year~~
- ~~This limitation is based upon the use of an incinerator with an overall volatile organic compounds destruction efficiency of 60 % for the printing press no.15 operation.~~
- ~~(d) The incinerator for VOC control shall be in operation at all times when the printing press is in operation.~~
- ~~These conditions limit the PTE of VOC from this operation to less than 40 tons per year. Therefore, the rules 326 IAC 2-2 and 40 CFR 52.21 do not apply.~~

D.4.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

~~Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), the printing presses [P12, P13, P14, P15, P16] shall utilize an alternative VOC reduction system that achieves at least 90% overall efficiency.~~

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the printing press P15 shall utilize a VOC capture system sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of 60% or greater.

12) Condition D.4.2

~~D.4.2 Volatile Organic Compound (VOC) Emission Limit~~

~~The quantity of ink and solvent content, as percent VOC by weight, shall be such that the monthly rolling VOC input shall not exceed 390 tons per year. Therefore, the requirements of 326 IAC 2-2 and (Prevention of Significant Deterioration) do not apply.~~

~~D.4.2 Volatile Organic Compound (VOC) [326 IAC 2-2-1 et seq.]~~

The annual VOC input to Press P15 shall be limited such that the potential to emit does not exceed 39 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) * (1 - (capture efficiency * destruction efficiency)) < / = 39 tons. Therefore, the requirements of 326 IAC 2-2-1 et seq. (Prevention of Significant Deterioration Requirements) do not apply.

13) Condition D.4.6

D.4.6 Testing Requirements [326 IAC 2-7-6(1)]

~~Compliance stack tests shall be performed for the **capture and** catalytic incinerator, OX15, used to achieve compliance with 8-5-5. This stack test shall be performed by the end of the year 1999, and thereafter at least once every two and one half (2 ½) years, to determine the minimum operating temperature that will achieve at least a 90% overall efficiency for this incinerator and the emission limit specified in Condition **D.4.1**.~~

- (a) **On or before July 31, 2001, the Permittee shall perform one capture test on Press P15 using EPA Method 204.**
- (b) **Compliance stack tests shall be performed on the catalytic oxidizer, OX 15, used to achieve compliance with 326 IAC 8-5-5. The initial test shall be performed on or before July 31, 2001 and thereafter at least once every two and one half (2 1/2)**

years (plus/minus 60 days) to determine the minimum operating temperature that will achieve a 90% or greater destruction efficiency for the oxidizer, OX 15. The Permanent Total Enclosure ("PTE") associated with press P15 shall be verified as meeting EPA Method 204 design criteria as part of the periodic test program for OX 15.

14) Condition D.4.7

D 4 7 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.
- (b) **The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation when the printing presses are operated.**
- (c) **To assure the continuing integrity of the PTE surrounding press P15, inspections and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:**
 - (1) **Monthly inspection and repair, as necessary, of flexible press hoses and fan motor belts;**
 - (2) **Monthly verification of air flow velocity at 200 feet per minute or greater inward through any natural draft opening in the PTE;**
 - (3) **Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizer, press supply ducts, and press exhaust ducts);**
 - (4) **Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;**
 - (5) **Monthly visual inspections of rooftop ductwork; and**
 - (6) **Implementation of an operational procedure checklist, including response procedures for deviations from the established operating conditions.**

15) Condition D.4.8

D.4.8 Record Keeping Requirements

~~To document compliance with Conditions D.4.1 and D.4.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.4.2:~~

- ~~(1) The volume weighted VOC content of the coatings used for each month;~~
- ~~(2) The cleanup solvent usage for each month;~~
- ~~(3) The total VOC usage for each month; and~~
- ~~(4) The weight of VOCs emitted for each compliance period.~~
- ~~(5) The continuous temperature records for the catalytic incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.~~

~~(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

To document compliance with Conditions D.4.1 and D.4.2, the Permittee shall maintain records in accordance with (a) through (g) below. Records maintained for (a) through (g) shall be complete and sufficient to establish compliance with Conditions D.4.1 and D.4.2.

- (a) Pounds of VOC usage from inks, coatings and press cleaning each day (this information may be retained in the computerized information management system of the plant);**
- (b) Pounds of VOC usage from inks, coatings and press cleaning each month (this information may be retained in the plant's computerized information management system);**
- (c) The calculated weight of VOCs emitted for each month as determined by the equation: (VOC usage) * (1 - (capture efficiency * destruction efficiency));**
- (d) The calculated 12 month rolling sum of emissions for each month;**
- (e) A copy of the most recent oxidizer destruction efficiency test report;**
- (f) A copy of the most recent PTE verification report; and**
- (g) Parametric monitoring records required under section D.4.7.**

16) Condition D.5.1

The modifications are made to section D.5 of the permit. The modified pages 36 and 37 containing section D.5 of this modification completely supercedes section D.5 on page 38a, 38b of the First Minor Permit Modification and page 36 and 37 of the original TV permit 031-5950-00001.

This condition was modified by First Minor Permit Modification No.031-10656. A new page 38a was added to the permit which contained the modified condition.

~~D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5] [326 IAC 2-2, and 40 CFR 52.21]~~

- ~~(a) When operating the incinerator to achieve the limit for rule 326 IAC 8-5-5(e)(3), a capture system must be used in conjunction with the incinerator to attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the incinerator, of 60% for the printing press no. 16. The overall destruction efficiency and the use of incinerator are required by the rule 326 IAC 8-5-5.~~
- ~~(b) Pursuant to 326 IAC 8-5-5(e)(3)(B) (Miscellaneous operations: graphic arts operations); on and after the date the performance test is completed, the owner or operator shall not cause or discharge more than 10 percent of the captured VOC's for each calendar month (90 % VOC destruction efficiency of the incinerator) from the flexographic printing press no. 16 by using the incinerator operated at the most recently demonstrated overall efficiency.~~
- ~~(c) Pursuant to OP No. 16-04-87-0049, the input of VOC to the printing press 16 shall be limited to less than 100 tons of VOC, including inks, solvents, and cleaning solvents as shown by the following equation, per 12 consecutive month period.~~
- ~~(VOC input to the printing press no. 15 including inks and dilution solvents + cleaning~~

~~solvents) * (1 - capture efficiency)(1 - control efficiency) < 40 tons per year~~

~~This limitation is based upon the use of an incinerator with an overall volatile organic compounds destruction efficiency of 60 % for the printing press no.15 operation.~~

~~(d) The incinerator for VOC control shall be in operation at all times when the printing press is in operation.~~

~~These conditions limit the PTE of VOC from this operation to less than 40 tons per year. Therefore, the rules 326 IAC 2-2 and 40 CFR 52.21 do not apply.~~

D.5.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

~~Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations), the printing presses [P12, P13, P14, P15, P16] shall utilize an alternative VOC reduction system that achieves at least 90% overall efficiency.~~

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the printing press P16 shall utilize a VOC capture system sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of 60% or greater.

17) Condition D.5.2

D.5.2 Volatile Organic Compound (VOC) Emission Limit

~~The quantity of ink and solvent content, as percent VOC by weight, shall be such that the monthly rolling VOC input shall not exceed 390 tons per year. Therefore, the requirements of 326 IAC 2-2 and (Prevention of Significant Deterioration) do not apply.~~

D.5.2 Volatile Organic Compound (VOC) [326 IAC 2-2-1 et seq.]

The annual VOC input to Press P16 shall be limited such that the potential to emit does not exceed 39 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) * (1 - (capture efficiency * destruction efficiency)) < / = 39 tons. Therefore, the requirements of 326 IAC 2-2-1 et seq. (Prevention of Significant Deterioration Requirements) do not apply.

18) Condition D.5.6

D.5.6 Testing Requirements [326 IAC 2-7-6(1)]

~~Compliance stack tests shall be performed for the **capture and** catalytic incinerator, OX16, used to achieve compliance with 8-5-5. This stack test shall be performed by the end of the year 2000, and thereafter at least once every two and one half (2 ½) years, to determine the minimum operating temperature that will achieve at least a 90% overall efficiency for this incinerator and the emission limit specified in **D.5.1**.~~

- (a) On or before July 31, 2001, the Permittee shall perform one capture test on Press P16.**
- (b) Compliance stack tests shall be performed on the catalytic oxidizer, OX 16, used to achieve compliance with 326 IAC 8-5-5. The initial test shall be performed on or before July 31, 2001 and thereafter at least once every two and one half (2 1/2) years (plus/minus 60 days) to determine the minimum operating temperature that will achieve a 90% or greater destruction efficiency for the oxidizer, OX 16.**

19) Condition D.5.7

D.5.7 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.
- (b) **The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation when the printing press is operated.**
- (c) **To assure that exhaust fumes are captured at a rate equivalent to or greater than the rate documented during the capture test described in Condition D.5.5 (a), the oxidizer system fan shall operate at or above the frequency range established during the capture test when Press P16 is running. Prior to the performance of the capture test described in Condition D.5.5(a), the oxidizer system fan shall operate within the 27-32 Hz frequency range when Press P16 is running. A meter and recorder shall be installed and operated on or before June 1, 2000 to document compliance with this condition.**
- (d) **Additional inspection and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:**
 - (1) **Monthly inspection and repair, as necessary, of flexible press hoses and fan motor belts;**
 - (2) **Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);**
 - (3) **Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;**
 - (4) **Monthly visual inspections of rooftop ductwork;**
 - (5) **Annual flow direction (i.e., "smoke") tests; and**
 - (6) **Implementation of an operational procedure checklist, including response procedures for deviations from the established fan run-mode Hz range.**

20) Condition D.5.8

D.5.8 Record Keeping Requirements

~~To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.5.2;~~

- ~~(1) The volume-weighted VOC content of the coatings used for each month;~~
- ~~(2) The cleanup solvent usage for each month;~~
- ~~(3) The total VOC usage for each month; and~~
- ~~(4) The weight of VOCs emitted for each compliance period;~~
- ~~(5) The continuous temperature records for the catalytic incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.~~
- ~~(b) All records shall be maintained in accordance with Section C - General Record Keeping~~

~~Requirements, of this permit.~~

To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (a) through (g) below. Records maintained for (a) through (g) shall be complete and sufficient to establish compliance with Conditions D.5.1 and D.5.2.

- (a) Pounds of VOC usage from inks, coatings and press cleaning each day (this information may be retained in the computerized information management system of the plant);**
- (b) Pounds of VOC usage from inks, coatings and press cleaning each month (this information may be retained in the plant's computerized information management system);**
- (c) The calculated weight of VOCs emitted for each month as determined by the equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency}))$;**
- (d) The calculated 12 month rolling sum of emissions for each month;**
- (e) A copy of the most recent oxidizer destruction efficiency test report;**
- (f) A copy of the representative baseline capture efficiency test report; and**
- (g) Parametric monitoring records required under section D.5.7.**

21) Condition D.8.1

~~D.8.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]~~

~~Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations) the printing press shall utilize a VOC reduction system that achieves at least 90% overall efficiency.~~

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the printing press P17 shall utilize a VOC capture system sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of 60% or greater.

22) Condition D.8.2

~~D.8.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]~~

- ~~(a) The input of volatile organic compounds (VOC) to the printing press P17, including the usage of cleanup solvent, shall be limited to 683.4 tons per twelve (12) consecutive month period. During the first 12 months of operation, the VOC input shall be limited such that the total VOC input divided by the accumulated months of operation shall not exceed 56.95 tons per month of operation.~~
- ~~(b) The catalytic incinerator shall be operated at all times that the printing press is in operation and shall achieve a minimum overall control efficiency of 95%.~~

~~Compliance with items (a) and (b) limits the PTE of volatile organic compounds (VOC) emitted from the P17 printing press to 35.44 tons per twelve (12) consecutive month period. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, do not apply.~~

~~D.8.2 Volatile Organic Compound (VOC) [326 IAC 2-2-1 et seq.]~~

- ~~(a) The annual VOC input to Press P17 shall be limited such that the potential to emit does not exceed 35.44 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each~~

month based on the previous 12 months. Compliance shall be documented using the following equation: (VOC usage) * (1 - (capture efficiency * destruction efficiency)) < / = 35.44 tons. Therefore, the requirements of 326 IAC 2-2-1 et seq. (Prevention of Significant Deterioration Requirements) do not apply.

- (b) Press Nos. 8, 10, and 11 shall be permanently shut down.**

23) Condition D.8.4

D.8.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and ~~content~~ **usage** limitations contained in Condition D.8.1 **and D.8.2** shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

24) Condition D.8.5

D.8.5 Testing Requirements [326 IAC 2-7-6(1)]

~~A compliance stack test shall be performed for the catalytic incinerator, OX16, used to achieve compliance with 326 IAC 8-5-5 and 326 IAC 2-2. This stack test shall be performed by the end of the year 2000, and thereafter at least once every two and one half (2 1/2) years, to determine the minimum operating temperature that will achieve at least a 95% overall efficiency for this incinerator such that the requirements of 326 IAC 2-2 and (Prevention of Significant Deterioration) do not apply.~~

- (a) On or before July 31, 2001, the Permittee shall perform one capture test on Press P17 using EPA Method 204.
- (a) Compliance stack tests shall be performed on the catalytic oxidizer, OX 16, used to achieve compliance with 326 IAC 8-5-5. The initial test shall be performed on or before July 31, 2001 and thereafter at least once every two and one half (2 1/2) years (plus/minus 60 days) to determine the minimum operating temperature that will achieve a 90% or greater destruction efficiency for the oxidizer, OX 16. The Permanent Total Enclosure ("PTE") associated with press P17 shall be verified as meeting EPA Method 204 design criteria as part of the periodic test program for OX 17.

25) Condition D.8.6

D.8.6 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic incinerator for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.
- (b) **The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation when the printing presses are operated.**
- (c) **To assure the continuing integrity of the PTE surrounding press 17, inspections and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:**
- (i) **Monthly inspection and repair, as necessary, of flexible press hoses and**

- fan motor belts;**
- (ii) Monthly verification of air flow velocity at 200 feet per minute or greater inward through any natural draft opening in the PTE;**
- (iii) Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizer, press supply ducts, and press exhaust ducts);**
- (iv) Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;**
- (v) Monthly visual inspections of rooftop ductwork; and**
- (vi) Implementation of an operational procedure checklist, including response procedures for deviations from the established operating conditions.**

26) Condition D.8.7

D.8.7 Record Keeping Requirements

-
- ~~(a) To document compliance with Conditions D.8.1 and D.8.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.8.2;~~
- ~~_____ (1) The volume weighted VOC content of the inks used for each month;~~
- ~~_____ (2) The cleanup solvent usage for each month;~~
- ~~_____ (3) The total VOC usage for each month; and~~
- ~~_____ (4) The weight of VOCs emitted for each compliance period.~~
- ~~_____ (5) The continuous temperature records for the catalytic incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.~~
- ~~_____ (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

To document compliance with Conditions D.8.1 and D.8.2, the Permittee shall maintain records in accordance with (a) through (g) below. Records maintained for (a) through (g) shall be complete and sufficient to establish compliance with Conditions D.8.1 and D.8.2.

- (a) Pounds of VOC usage from inks, coatings and press cleaning each day (this information may be retained in the computerized information management system of the plant);**
- (b) Pounds of VOC usage from inks, coatings and press cleaning each month (this information may be retained in the plant's computerized information management system);**
- (c) The calculated weight of VOCs emitted for each month as determined by the equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency}))$;**
- (d) The calculated 12 month rolling sum of emissions for each month;**
- (e) A copy of the most recent oxidizer destruction efficiency test report;**
- (f) A copy of the representative baseline capture efficiency test report; and**
- (g) Parametric monitoring records required under section D.8.6.**

27) Condition D.9.1

D.9.1 Volatile Organic Compound (VOC) [326 IAC 8-5-5]

~~Pursuant to 326 IAC 8-5-5 (Graphics Arts Operations) the printing presses shall utilize a VOC reduction system that achieves at least 90% overall efficiency.~~

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the printing presses P18 and P19 shall utilize a VOC capture system sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of 60% or greater.

28) Condition D.9.2

~~**D.9.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]**~~

~~(a) The input of volatile organic compounds (VOC) to the printing presses P18 and P19, including the usage of cleanup solvent, shall be limited to 1418.0 tons per twelve (12) consecutive month period. During the first 12 months of operation, the VOC input shall be limited such that the total VOC input divided by the accumulated months of operation shall not exceed 118.16 tons per month of operation.~~

~~(b) The catalytic incinerator shall be operated at all times that the printing press is in operation and shall achieve a minimum overall control efficiency of 97%.~~

~~Compliance with items (a) and (b) limits the PTE of volatile organic compounds (VOC) emitted from the P18 and P19 printing presses to 42.54 tons per twelve (12) consecutive month period. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, do not apply.~~

D.9.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2 et seq.]

(a) The annual VOC input to Presses P18 and P19 shall be limited such that the potential to emit does not exceed 42.54 tons, considering the most recent determination of capture and destruction. Compliance with this limit shall be determined at the end of each month based on the previous 12 months. Compliance shall be documented using the following equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency})) < / = 42.54 \text{ tons}$. Therefore, the requirements of 326 IAC 2-2-1 et seq. (Prevention of Significant Deterioration Requirements) do not apply.

(b) Press Nos 8, 10, and 11 shall be permanently shut down.

29) Condition D.9.4

D.9.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and control **usage** limitations contained in Condition D.9.1 and D.9.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

30) Condition D.9.5

D.9.5 Testing Requirements [326 IAC 2-7-6(1)]

A compliance stack test shall be performed for the regenerative thermal oxidizer, OX20, used to achieve compliance with 326 IAC 8-5-5 and 326 IAC 2-2. This stack test shall be performed by the end of the year 2000, and thereafter at least once every two and one half (2 ½) years, to determine the minimum operating temperature that will achieve at least a 97% overall efficiency

~~for this incinerator such that the requirements of 326 IAC 2-2 and (Prevention of Significant Deterioration) do not apply.~~

- (a) Within 120 days after startup, the Permittee shall perform capture testing on Presses P18 and P19 using EPA Method 204.**
- (b) Compliance stack tests shall be performed on the catalytic oxidizer, OX 20, used to achieve compliance with 326 IAC 8-5-5. The initial test shall be performed within 120 days after startup and thereafter at least once every two and one half (2 1/2) years (plus/minus 60 days) to determine the minimum operating temperature that will achieve a 90% or greater destruction efficiency for the oxidizer, OX 20. The Permanent Total Enclosure ("PTE") associated with presses P18 and P19 shall be verified as meeting EPA Method 204 design criteria as part of the periodic test program for OX 20.**

31) Condition D.9.6

D.9.6 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.**
- (b) The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation when the printing presses are operated.**
- (c) To assure continuing integrity of the PTE surrounding presses P18 and P19, inspections and preventive measures shall be performed as prescribed in a Preventive Maintenance Plan. At a minimum, the plan shall include:**
 - (a) Monthly inspection and repair, as necessary, of flexible press hoses and fan motor belts;**
 - (b) Monthly verification of air flow velocity at 200 feet per minute or greater inward through any natural draft opening in the PTE;**
 - (c) Quarterly inspection and repair, as necessary, of all automatic dampers (oxidizer, press supply ducts, and press exhaust ducts);**
 - (d) Monthly inspections of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;**
 - (e) Monthly visual inspections of rooftop ductwork; and**
 - (f) Implementation of an operational procedure checklist, including response procedures for deviations from the established operating conditions.**

32) Condition D.9.7

D.9.7 Record Keeping Requirements

- ~~**(a) To document compliance with Conditions D.9.1 and D.9.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.9.2;**~~

~~————— (1) The volume weighted VOC content of the inks used for each month;~~

~~————— (2) The cleanup solvent usage for each month;~~

- ~~_____ (3) The total VOC usage for each month; and~~
- ~~_____ (4) The weight of VOCs emitted for each compliance period.~~
- ~~_____ (5) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test.~~
- ~~_____ (b) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~

To document compliance with Conditions D.9.1 and D.9.2, the Permittee shall maintain records in accordance with (a) through (g) below. Records maintained for (a) through (g) shall be complete and sufficient to establish compliance with Conditions D.9.1 and D.9.2.

- (a) Pounds of VOC usage from inks, coatings and press cleaning each day (this information may be retained in the computerized information management system of the plant);**
- (b) Pounds of VOC usage from inks, coatings and press cleaning each month (this information may be retained in the plant's computerized information management system);**
- (c) The calculated weight of VOCs emitted for each month as determined by the equation: $(\text{VOC usage}) * (1 - (\text{capture efficiency} * \text{destruction efficiency}))$;**
- (d) The calculated 12 month rolling sum of emissions for each month;**
- (e) A copy of the most recent oxidizer destruction efficiency test report;**
- (f) A copy of the representative baseline capture efficiency test report; and**
- (g) Parametric monitoring records required under section D.9.6.**

Conclusion

The operation of this printed plastic bag and plastic film production plant shall be subject to the conditions of the attached proposed Significant Permit Modification No. 031-12005-00001.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit

Source Name:	Printpack, Inc.
Source Location:	1505 West Main Street, Greensburg, Indiana 47240
County:	Decatur
SIC Code:	3714
Operation Permit No.:	T 031-5950-00001
Operation Permit Issuance Date:	December 21, 1998
Significant Permit Modification No.:	031-12005-00001
Permit Reviewer:	Gurinder Saini

On September 28, 2000, the Office of Air Management (OAM) had a notice published in the Greensburg Daily News, Greensburg, Indiana, stating that Printpack, Inc. had applied for a Significant Permit Modification to a Part 70 Operating Permit. The notice also stated that OAM proposed to issue a permit modification for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 30, 2000, a facsimile message was received from Douglas E. Cloud of Alston & Bird LLP representing Printpack, Inc. with comments on this significant permit modification. The comment is as follows:

Comment 1:

For the permit conditions D.4.6 (a), D.8.5 (a) and D.9.5 (a), it was proposed that the following language be added after each reference to EPA method 204: "(i.e., verification that the design of the existing permanent total enclosure meets the EPA method 204 design criteria)". Although this language does not appear in the significant permit modification, we understand the IDEM's position to be that, if design verification is permitted under EPA method 204, then design verification is an acceptable approach for future testing of the subject presses (P15, P17, P18 and P19).

Response 1:

The OAM prefers to establish site-specific testing requirements as part of the test protocol approval process. The condition C.10 of the permit requires the Permittee to submit a test protocol for approval to the Compliance Data Section of Office of Air Management.

Comment 2:

On August 14, 2000, OAM, IDEM, received a letter from Printpack, Inc. requesting that their automatic parts washer was deactivated and was replaced by a manual parts washer. The company requested that this change be implemented in the permit.

Response 2:

The conditions A.2 (13) and D.6 (13) are modified as follows (with language removed shown in ~~strikeout~~ and language added shown in **bold**):

One (1) ~~automatic~~ **manual** parts washer system, identified as **PW1**, using no control, and exhausting to stack SW1.